SAFEGUARDING POLICY

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Introduction

Hope After Harm is committed to safeguarding and promoting the welfare of children, young people and adults at risk. Safeguarding is central to our values, our culture and everything we do. We believe that everyone has the right to be safe, to be treated with dignity and respect, and to live free from abuse, harm and exploitation.

Creating and maintaining a culture of safeguarding is a shared responsibility. Every staff member, volunteer, trustee and partner plays a vital role in protecting those we work with. This requires vigilance, professional curiosity, accountability, and a willingness to act on concerns. Abuse and neglect will not be tolerated under any circumstances, and safeguarding will always take precedence over organisational, professional or personal considerations. Through our services, we may work with individuals who may be vulnerable to harm. This policy sets out our commitment to safeguarding and establishes clear expectations and responsibilities for everyone working on behalf of Hope After Harm.

This policy applies to all staff, volunteers, trustees, contractors, consultants, students, agency workers and anyone working on behalf of Hope After Harm, whether in the UK or internationally. All staff and volunteers are required to read, understand and comply with this policy, and to actively contribute to a safe and supportive environment.

This policy must be read alongside Hope After Harm's Digital Safeguarding Policy and International Safeguarding Addendum (Annex A), which provide additional requirements relating to digital service delivery and international activity.

Legislative and Policy Framework

This policy is informed by safeguarding legislation and statutory guidance in England, including the Children Act 1989 and 2004, the Children's Wellbeing and Schools Act 2026, the Care Act 2014, the Safeguarding Vulnerable Groups Act 2006, the Domestic Abuse Act 2021, the Data Protection Act 2018, UK GDPR, Working Together to Safeguard Children (2026), and the Information Sharing Duty: Statutory Guidance for Safeguarding Organisations and their Practitioners (2026). A fuller list is provided at Annex B.

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Where Hope After Harm operates internationally or delivers services accessible internationally, safeguarding practice will also be informed by international safeguarding standards and principles, including the UN Convention on the Rights of the Child.

The International Safeguarding Addendum forms part of this policy and provides further detail on safeguarding responsibilities when working internationally, including partnership requirements, reporting arrangements and safeguarding risk management.

Hope After Harm will apply the highest safeguarding standard where there is any difference between UK and local safeguarding requirements.

Our Safeguarding Culture and Commitment

Safeguarding is not only about responding to harm but about creating an environment where harm is less likely to occur and concerns are recognised and addressed early.
Hope After Harm is committed to:

- Promoting a culture where safeguarding is openly discussed, understood and prioritised
- Ensuring all staff and volunteers understand their safeguarding responsibilities
- Encouraging vigilance and professional curiosity
- Supporting staff and volunteers to raise concerns without hesitation
- Responding to safeguarding concerns promptly and appropriately
- Delivering services in a trauma-informed, respectful and inclusive way
- Ensuring safeguarding applies equally to in-person, digital and international work

All staff and volunteers have both a legal and professional duty of care to safeguard those we work with.

Key Definitions

- **Safeguarding** refers to the measures and practices put in place to prevent harm, protect individuals from abuse and neglect, and promote their safety, wellbeing and rights. It includes creating a safe organisational culture, responding appropriately to concerns, and reducing the risk of harm in all areas of the organisation's work, including digital and international activity.
- **Protection** refers to the actions taken to respond to safeguarding concerns where there is a risk of harm. This includes recognising concerns, reporting them appropriately, and working with relevant agencies to ensure individuals are safe.
- A **safeguarding concern** is any information, disclosure, allegation, incident or observation which suggests that a child or adult at risk may be experiencing abuse, neglect, exploitation, or may be at risk of harm. In relation to children, this also includes information indicating an emerging or unmet need which may affect their safety or welfare or indicate that early help or preventative support may be required. A child does not need to meet a particular statutory or child protection threshold before safeguarding information is considered for sharing.

- **Abuse** is any action or failure to act that results in harm, exploitation or distress. Abuse may involve the misuse of power, trust or control and can occur in any setting, including in person or online. Abuse may include physical abuse, emotional or psychological abuse, sexual abuse, neglect, financial or material abuse, discriminatory abuse, domestic abuse, bullying, harassment, or exploitation.
- **Neglect** is the persistent failure to meet an individual's basic physical, emotional, psychological or social needs, which is likely to result in harm or impairment to their health, wellbeing or development.
- **Harm** is the ill-treatment or impairment of an individual's physical or mental health, wellbeing or development, including harm caused by abuse, neglect, exploitation, or exposure to harmful situations.
- **Disclosure** is when an individual communicates that they have experienced, or are experiencing, abuse, neglect or harm. Disclosure may be made verbally, in writing, through behaviour, or through digital communication.
- **Allegation** is a concern or claim that a staff member, volunteer, trustee, contractor, partner or other person in a position of trust may have caused harm, abused their position, or posed a risk of harm to a child or adult at risk.
- **Adult at risk** is a person aged 18 or over who has care and support needs and may be unable to protect themselves from abuse, neglect or exploitation.
- **Child** is any person under the age of 18. **Child protection** is part of safeguarding and refers to the actions taken to protect children who are suffering, or are likely to suffer, significant harm as a result of abuse or neglect.
- **Position of trust** refers to a role in which an individual has authority, responsibility, influence or access in relation to a child or adult at risk, including staff, volunteers, trustees, contractors and partners.
- **Duty of care** refers to the legal and professional responsibility to take reasonable steps to protect individuals from harm, act in their best interests, and respond appropriately to safeguarding concerns.
- **Designated Safeguarding Lead** (DSL) is the person responsible for overseeing safeguarding within the organisation, providing safeguarding advice and guidance, and ensuring safeguarding concerns are appropriately reported to relevant statutory agencies.

Individual Responsibilities

Safeguarding is everyone's responsibility. All staff and volunteers must:

- Read, understand and comply with this policy and where relevant to their roles, the Digital Safeguarding Policy, and the International Safeguarding Addendum

- Remain alert to safeguarding risks and concerns in physical, digital and international contexts.
- When working with an adult, consider whether information obtained indicates that a child connected with that adult may be affected or in need of support, and take appropriate safeguarding action where required.
- Take all safeguarding concerns seriously
- Report concerns promptly and appropriately
- Maintain appropriate professional boundaries
- Act in the best interests of service users at all times
- Contribute to a culture where safeguarding is openly discussed and prioritised

No one should assume that someone else will report a concern. If you are concerned, you must act.

Failure to report safeguarding concerns may place individuals at risk of harm and may result in disciplinary action.

Organisational Responsibilities

The **Board of Trustees** holds overall responsibility for safeguarding governance and ensuring safeguarding is embedded throughout the organisation, including oversight of digital and international safeguarding risks. A Trustee Safeguarding Lead provides oversight and support. To support the Trustees in their duties, a standalone Trustee Safeguarding Responsibilities Summary is provided (Annex C).

The **CEO** acts as the **Designated Safeguarding Lead** and is responsible for ensuring safeguarding concerns are managed appropriately and referred to relevant authorities where required.

Deputy Safeguarding Leads are appointed to ensure safeguarding responsibilities can be fulfilled at all times.

Managers are responsible for promoting safeguarding practice, supporting staff and volunteers, and ensuring safeguarding concerns are appropriately managed.

Safer Recruitment

Hope After Harm is committed to safer recruitment practices to ensure individuals working on behalf of the organisation are suitable for their roles.

Appropriate background checks, including Disclosure and Barring Service checks where required, are undertaken. Equivalent safeguarding checks are undertaken for international roles where DBS checks are not available.

Hope After Harm has a legal duty to refer individuals to the Disclosure and Barring Service where they are removed from regulated activity due to safeguarding risk.

Digital and International Safeguarding

Safeguarding standards apply regardless of geographical location or method of service delivery. Additional safeguarding requirements relating to digital services, including online contact, digital disclosures, professional boundaries and information security, are set out in the Digital Safeguarding Policy.

Additional safeguarding requirements relating to international activity, including international partnerships, reporting arrangements and safeguarding risk management, are set out in the International Safeguarding Addendum.

Safeguarding disclosures received through digital platforms will be treated in the same way as disclosures received in person.

Reporting Safeguarding Concerns

All safeguarding concerns must be reported immediately to a manager or if unavailable, a Deputy Safeguarding Lead, or the Designated Safeguarding Lead. Staff and volunteers may report safeguarding concerns directly to the Designated Safeguarding Lead if they feel unable to report through line management.

If an individual is in immediate danger, emergency services must be contacted immediately and safeguarding leads informed as soon as possible.

Safeguarding concerns will be taken seriously and acted upon promptly. Appropriate referrals will be made to safeguarding authorities, including local authorities, police, or other relevant agencies.

If a concern involves the DSL, it must be reported to the Trustee Safeguarding Lead or Chair of Trustees.

Professional Boundaries and Conduct

All staff and volunteers must maintain appropriate professional boundaries and act in a way that protects service users, themselves and the organisation. The Professional Boundaries Policy provides further guidance.

Information Sharing and Confidentiality

Effective information sharing is an essential part of safeguarding and promoting the welfare of children and adults at risk. Safeguarding information may need to be shared to identify and respond to harm, emerging concerns, unmet need or the need for early or preventative support. In relation to children, there is no requirement for a particular statutory or child protection threshold to have been reached before relevant information is shared. Where Hope After Harm is subject to the information sharing duty under section 16LA of the Children Act 2004, information must be shared with another organisation within scope of the duty where Hope After Harm:

- holds information about a child, or about another individual connected with that child;
- considers that information relevant to safeguarding or promoting the child's welfare; and
- considers that sharing the information may help the recipient assess need or risk, make a decision, provide support or take action to safeguard or promote the child's welfare.

Information will not be shared under this duty where, through professional judgement, it is considered that sharing would be more detrimental to the child than not sharing. Any such decision must be exceptional, clearly reasoned and recorded, and consideration must be given to whether the potential detriment can be mitigated by limiting or adapting the information shared.

Where Hope After Harm is not directly subject to the statutory information sharing duty, these principles will be applied as safeguarding best practice, alongside applicable data protection, confidentiality and safeguarding requirements. Relevant information may relate to another person connected with a child, including a parent, carer, family member, peer or other adult. Staff supporting adults must therefore consider whether information they hold may be relevant to the safety or welfare of any child connected with that adult.

Lack of consent does not, by itself, prevent relevant safeguarding information from being shared. Where the section 16LA duty applies, information shared in accordance with the duty does not breach an obligation of confidence. Wherever safe and appropriate, individuals should be informed about what information is being shared and why. Data protection legislation continues to apply to the processing and handling of personal information.

Information shared must be relevant, necessary, proportionate, accurate and secure. Staff should seek prompt advice from the Designated Safeguarding Lead or a Deputy Safeguarding Lead where they are uncertain, but uncertainty must not cause inappropriate delay where a child may require support or protection. Safeguarding information will be recorded accurately and stored securely in accordance with data protection legislation and the Digital Safeguarding Policy.

Decisions to share or not share information must be recorded, including what information was considered, what was shared or withheld, with whom, the reason for the decision and any consideration of potential detriment to the child. Data breaches or information security incidents involving personal or sensitive information may constitute safeguarding incidents and will be reported and managed accordingly.

Training and Support

Hope After Harm provides safeguarding training, supervision and support to ensure staff and volunteers understand their responsibilities, including safeguarding in digital and international contexts. Training will include responsibilities relating to safeguarding information sharing, including recognising when information obtained through work with an adult may be relevant to the welfare of a child connected with that adult. Safeguarding is discussed regularly at team and individual meetings to promote awareness, learning and continuous improvement and forms part of our internal communications.

Safeguarding forms part of regular supervision to support staff and volunteers and ensure safeguarding risks are identified and managed appropriately.

Partnership, Contractor and Subcontractor Safeguarding

Hope After Harm works with partner organisations, contractors and subcontractors to deliver services, training, consultancy and digital programmes. Safeguarding remains a fundamental responsibility in all such arrangements. Appropriate safeguarding due diligence is undertaken before entering into partnerships or contracts. Partners, contractors and subcontractors must have safeguarding policies and practices consistent with safeguarding legislation and Hope After Harm's safeguarding standards.

Safeguarding responsibilities and reporting arrangements are defined within agreements. All partners, contractors and subcontractors are required to report safeguarding concerns promptly and cooperate fully with safeguarding processes. Hope After Harm monitors safeguarding arrangements and will take appropriate action where standards are not met, including requiring improvements or terminating agreements where necessary to protect

individuals from harm. These requirements apply to both UK and international arrangements.

Monitoring and Governance

Hope After Harm monitors safeguarding practice to ensure safeguarding remains effective across all areas of its work, including digital and international activity. The Board of Trustees provides safeguarding oversight and ensures safeguarding remains a priority. It receives a quarterly report on safeguarding and there is an annual safeguarding review which is also reported to the Board.

Safeguarding risks, including those arising from digital systems and data protection, form part of the organisation's overall risk management and governance framework.

Policy Review

This policy will be reviewed annually and approved by the Board of Trustees.

Safeguarding Declaration

Hope After Harm is committed to maintaining a strong culture of safeguarding. Safeguarding is everyone's responsibility, and all those working on behalf of the organisation are expected to uphold the highest standards of conduct and vigilance.

By signing this declaration, you confirm that you understand your safeguarding responsibilities and your duty of care to protect the safety and wellbeing of children, young people and adults at risk.

You are required to:

- Read and comply with the Hope After Harm Safeguarding Policy
- Read and comply with the Digital Safeguarding Policy (where applicable to your role – please tick)
- Read and comply with the International Safeguarding Addendum (where applicable to your role – please tick)
- Understand your responsibility to recognise and report safeguarding concerns
- Report any safeguarding concerns promptly and appropriately
- Maintain appropriate professional boundaries at all times

- Act in a way that promotes a safe and supportive environment
- Participate in safeguarding training as required

You understand that failure to follow safeguarding requirements may result in disciplinary action and, where appropriate, referral to relevant safeguarding authorities.
Safeguarding concerns must never be ignored. If you are concerned about the safety or wellbeing of any individual, you must report your concern immediately.

Declaration
I confirm that I have read, understood, and agree to comply with the Hope After Harm Safeguarding Policy, Digital Safeguarding Policy, and International Safeguarding Addendum (where applicable). I understand my safeguarding responsibilities and my duty to report any safeguarding concerns.

Name:
Role:
Signature:
Date:

Annex A: International Safeguarding Addendum

Purpose and Scope
This addendum forms part of Hope After Harm's Safeguarding Policy and sets out additional safeguarding requirements where Hope After Harm operates internationally, works with international partners, delivers international training or consultancy, or provides digital services accessed outside the United Kingdom.

This addendum applies to all staff, volunteers, trustees, contractors, subcontractors and partners involved in international activity on behalf of Hope After Harm. All individuals must comply with this addendum alongside the Safeguarding Policy and Digital Safeguarding Policy.

Safeguarding Principles in an International Context
Hope After Harm recognises that safeguarding risks may arise in different legal, cultural and operational environments. Safeguarding standards must not be reduced or compromised due to geographical location or local practice.

Hope After Harm will apply safeguarding standards consistent with UK legislation and safeguarding best practice. Where local safeguarding requirements differ, Hope After Harm will apply the higher safeguarding standard. Hope After Harm has zero tolerance for sexual exploitation, abuse or harassment and is committed to protecting the dignity, rights and safety of all individuals.

Safeguarding responsibilities apply equally to in-person, remote and digital international activity.

Safeguarding Risk Assessment
Hope After Harm will assess safeguarding risks before undertaking international activity. This includes assessing risks associated with:

- Partner organisations
- Contractors and subcontractors
- Digital service delivery
- Training, consultancy and programme delivery
- Local safeguarding infrastructure and reporting mechanisms

Appropriate safeguarding controls and reporting arrangements will be established before activities commence.

Partnership and Contractor Safeguarding
Hope After Harm undertakes safeguarding due diligence before entering into international partnerships or contractual arrangements.

International partners, contractors and representatives must meet Hope After Harm's safeguarding standards and demonstrate appropriate safeguarding policies, safe recruitment and safeguarding practices. Safeguarding responsibilities and reporting arrangements are defined within agreements. International partners must report safeguarding concerns promptly and cooperate fully with safeguarding processes.

Hope After Harm will take appropriate action where safeguarding standards are not met, including requiring improvements, suspending activities, or terminating partnerships where necessary to protect individuals from harm.

Reporting Safeguarding Concerns Internationally

All safeguarding concerns arising from international activity must be reported immediately in accordance with Hope After Harm's Safeguarding Policy. The Designated Safeguarding Lead or Deputy will assess concerns and determine appropriate action. This may include referral to relevant local safeguarding authorities, law enforcement agencies, or other appropriate safeguarding bodies. Where local safeguarding systems are limited, unavailable, or unsafe, Hope After Harm will take appropriate alternative action, including applying UK safeguarding standards and seeking appropriate safeguarding advice. Safeguarding concerns must always be escalated internally, regardless of local reporting arrangements.

Hope After Harm promotes a culture where safeguarding concerns can be raised without fear of retaliation, and all concerns will be taken seriously.

Digital Safeguarding and Cross-Border Risk

Hope After Harm recognises that digital platforms may be accessed internationally and may present safeguarding risks across jurisdictions. Safeguarding concerns arising through digital platforms must be reported and managed in accordance with the Safeguarding Policy and Digital Safeguarding Policy. Safeguarding responsibilities apply regardless of the location of the service user or staff member.

Data breaches or information security incidents involving international service users may constitute safeguarding incidents and must be reported and managed accordingly.

Information Sharing and Confidentiality

Safeguarding information arising from international activity will be recorded, stored and shared in accordance with Hope After Harm's Safeguarding Policy, Digital Safeguarding Policy and Data Protection Policy. Information will be shared with safeguarding authorities where necessary to protect individuals from harm, taking into account legal, safety and confidentiality considerations. Safeguarding considerations take precedence over confidentiality where there is a risk of harm. The information sharing duty under section

16LA of the Children Act 2004 applies in England. Information sharing relating to international activity will additionally take account of applicable local law, cross-border data protection requirements and the provisions of this Addendum.

Training and Awareness

Staff and volunteers involved in international activity will receive appropriate safeguarding training and guidance. This includes understanding safeguarding risks in international and digital contexts, recognising safeguarding concerns, and understanding reporting responsibilities. Staff and volunteers must remain vigilant to safeguarding risks and report concerns promptly.

Governance and Oversight

The Designated Safeguarding Lead is responsible for overseeing safeguarding in international activity and ensuring safeguarding concerns are appropriately managed.

The Board of Trustees maintains oversight of safeguarding risks arising from international activity as part of its safeguarding governance responsibilities.

Safeguarding risks arising from international activity form part of Hope After Harm's overall safeguarding and risk management framework.

Review

This addendum will be reviewed annually alongside the Safeguarding Policy to ensure it remains effective and reflects current safeguarding legislation, guidance and organisational practice.

Annex B: List of Legislation and Guidance

Primary legislation

- Children Act 1989
- Children Act 2004
- Children and Social Work Act 2017
- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Domestic Abuse Act 2021
- Counter-Terrorism and Security Act 2015
- Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
- Human Rights Act 1998
- Equality Act 2010
- Mental Health Act 1983 (as amended 2007)
- Rehabilitation of Offenders Act 1974
- Police Act 1997
- **Children's Wellbeing and Schools Act 2026**

Statutory guidance

- Working Together to Safeguard Children (HM Government, 2026)
- Care and Support Statutory Guidance (issued under the Care Act 2014)
- Information Sharing Duty: Statutory Guidance for Safeguarding Organisations and their Practitioners (Department for Education, September 2026), issued pursuant to section 16LA of the Children Act 2004.

Annex C: Trustee Safeguarding Responsibilities Summary

Purpose

The Board of Trustees has ultimate responsibility for ensuring that Hope After Harm safeguards children, young people and adults at risk. Trustees must ensure safeguarding is embedded within the organisation's governance, culture and operations.

Safeguarding is a governance responsibility and cannot be delegated, although operational responsibility is delegated to the Designated Safeguarding Lead.

Trustee Responsibilities

Trustees are responsible for ensuring that:

- Hope After Harm has appropriate safeguarding policies and procedures in place
- Safeguarding policies are reviewed and approved at least annually
- A Designated Safeguarding Lead and Deputy Safeguarding Leads are appointed
- Safeguarding responsibilities are clearly defined across the organisation
- Safeguarding is embedded in organisational culture and practice
- Safeguarding risks are identified and managed appropriately

Trustees must ensure safeguarding applies across all areas of the organisation, including:

- Service delivery
- Digital platforms and systems
- International activity
- Partnerships, contractors and subcontractors

Oversight and Monitoring

The Board must:

- Receive regular safeguarding reports (at least quarterly)
- Review safeguarding incidents, risks and trends
- Ensure appropriate action is taken in response to safeguarding concerns
- Ensure safeguarding is reflected in the organisation's risk register
- Ensure safeguarding forms part of organisational governance and risk management

The Trustee Safeguarding Lead provides additional scrutiny and oversight and acts as a point of escalation where needed.

Serious Incidents and External Reporting

Trustees must ensure that serious safeguarding incidents are reported appropriately, including to:

- The Charity Commission (where required)
- Statutory safeguarding authorities
- The Disclosure and Barring Service (where required)

Trustees must ensure Hope After Harm cooperates fully with safeguarding investigations.

Trustee Conduct and Accountability

Trustees must:

- Act in the best interests of beneficiaries
- Promote a culture of safeguarding and accountability
- Challenge and scrutinise safeguarding practice where appropriate
- Ensure safeguarding is prioritised appropriately

Trustees share collective responsibility for safeguarding governance.